



## DEPARTMENT OF ENVIRONMENTAL QUALITY

KATHLEEN BABINEAUX BLANCO

GOVERNOR

MIKE D. McDANIEL, Ph.D.

SECRETARY

Certified Mail No.

Activity No.: PER19960004

Agency Interest No. 32804

Steve Rowland  
Chief Operations Officer  
CII Carbon, L.L.C.  
2021 Lakeshore Drive, Suite 200  
New Orleans, LA 70122

RE: Part 70 Operating Permit, Gramercy Coke Plant  
CII Carbon, L.L.C., Gramercy, St. James Parish, Louisiana

Dear Mr. Rowland:

This is to inform you that the permit for the above referenced facility has been approved under LAC 33:III.501. The permit is both a state preconstruction and Part 70 Operating Permit. The submittal was approved on the basis of the emissions reported and the approval in no way guarantees the design scheme presented will be capable of controlling the emissions as to the types and quantities stated. A new application must be submitted if the reported emissions are exceeded after operations begin. The synopsis, data sheets and conditions are attached herewith.

It will be considered a violation of the permit if all proposed control measures and/or equipment are not installed and properly operated and maintained as specified in the application.

Operation of this facility is hereby authorized under the terms and conditions of this permit. This authorization shall expire at midnight on the \_\_\_\_ of \_\_\_\_\_, 2011, unless a timely and complete renewal application has been submitted six months prior to expiration. Terms and conditions of this permit shall remain in effect until such time as the permitting authority takes final action on the application for permit renewal. The permit number and agency interest number cited above should be referenced in future correspondence regarding this facility.

Done this \_\_\_\_\_ day of \_\_\_\_\_, 2006.

Permit No.: 2560-00047-V0

Sincerely,

Chuck Carr Brown Ph.D.  
Assistant Secretary  
CCB:TAM  
c: EPA Region VI

**ENVIRONMENTAL SERVICES**

: PO BOX 4313, BATON ROUGE, LA 70821-4313

P:225-219-3181 F:225-219-3309

WWW.DEQ.LOUISIANA.GOV

**PUBLIC NOTICE**  
**LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY (LDEQ)**  
**CII CARBON, L.L.C.**  
**GRAMERCY COKE PLANT**  
**PROPOSED INITIAL PART 70 AIR OPERATING PERMIT**

The LDEQ, Office of Environmental Services, is accepting written comments on the initial Part 70 Air Operating Permit for CII Carbon, L.L.C., 2021 Lake Shore Drive, Suite 200, New Orleans, LA 70122 for the Gramercy Coke Plant. **The facility is located at 1140 Jefferson Highway in Gramercy, St. James Parish.**

CII Carbon, L.L.C. requested an initial Part 70 air operating permit. The facility currently operates under Permit No. 2560-00047-02. Gramercy Coke Plant produces calcined coke from green coke. Green petroleum coke is received by trucks and barges from where it is brought to the stockpile and then transferred to a storage bin. Residual moisture and volatile compounds are removed from the green coke using a natural gas-fire countercurrent rotary kiln. The calcined coke is discharged from the kiln into a rotary cooler where it is quenched with water. The product is treated for dust control in a screw conveyor with a chemical wetting agent and is transferred to the calcined coke storage dome for loading into ships.

Changes associated with this initial part 70 air operating permit include the addition of existing minor sources not identified in previous permits. Also, the operating hours have been increased from 8,400 hours per year to 8,760 hour per year to provide greater operating flexibility.

Estimated emissions in tons per year are as follows:

<u>Pollutant</u>	<u>Before</u>	<u>After</u>	<u>Change</u>
PM <sub>10</sub>	326.80	334.59	+ 7.79
SO <sub>2</sub>	3339.00	6,351.00	+ 3,012
NO <sub>x</sub>	378.00	394.02	+ 16.02
CO	< 0.01	0.02	+ 0.02
VOC	0.84	6.99	+ 6.15
SO <sub>3</sub>	105.00	110.00	+ 5.00

Written comments, written requests for a public hearing or written requests for notification of the final decision regarding this permit action may be submitted to Ms. Soumaya Ghosn at LDEQ, Public Participation Group, P.O. Box 4313, Baton Rouge, LA 70821-4313. **Written comments and/or written requests must be received by 12:30 p.m., Thursday, March 23, 2006.** Written comments will be considered prior to a final permit decision.

If LDEQ finds a significant degree of public interest, a public hearing will be held. LDEQ will send notification of the final permit decision to the applicant and to each person who has submitted written comments or a written request for notification of the final decision.

The application, proposed permit and statement of basis are available for review at the LDEQ, Public Records Center, Room 127, 602 North 5<sup>th</sup> Street, Baton Rouge, LA. Viewing hours are from 8:00 a.m. to 4:30 p.m.,

Monday through Friday (except holidays). Additional copies may be reviewed at the St. James Parish Library Headquarters, 1879 West Main Street, Litcher, LA 70071.

Inquiries or requests for additional information regarding this permit action should be directed to Mr. Tommy Menuet, LDEQ, Air Permits Division, P.O. Box 4313, Baton Rouge, LA 70821-4313, phone (225) 219-3052.

Persons wishing to be included on the LDEQ permit public notice mailing list should contact Ms. Soumaya Ghosn in writing at LDEQ, P.O. Box 4313, Baton Rouge, LA 70821-4313, phone (225) 219-3276, or by email at [maillistrequest@ldeq.org](mailto:maillistrequest@ldeq.org).

Permit public notices can be viewed on the LDEQ Permits public Web page at [WWW.deq.state.la.us/news/PubNotice/](http://WWW.deq.state.la.us/news/PubNotice/).

Alternatively, individuals may elect to receive the permit public notices via email by subscribing to the LDEQ permits public notice List Server at [http://www.state.la.us/ldbc/listservpage/ldeq\\_pn\\_listserv.htm](http://www.state.la.us/ldbc/listservpage/ldeq_pn_listserv.htm).

**All correspondence should specify AI Number 32804, Permit Number 2560-00047-V0, and Activity Number PER19960004.**

**Publication date: February 16, 2006.**

**AIR PERMIT BRIEFING SHEET**  
**AIR PERMITS DIVISION**  
**LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY**

**Gramercy Coke Plant**  
**Agency Interest No.: 32804**  
**CII Carbon, L.L.C**  
**Gramercy, St. James Parish, Louisiana**

**I. Background**

CII Carbon, L.L.C., Gramercy Coke Plant, an existing coke calcining facility began operation in September 1972. The Plant was originally owned and operated by Kaiser Aluminum and Chemical Company. Kaiser Aluminum was purchased by La Roche Chemical, Inc. in June of 1988. CII Carbon, L.L.C. purchased the coke calcining and energy recovery operations from La Roche Chemical, Inc. in December of 1988. The Gramercy Coke Plant currently operates under Permit No. 2560-00047-02, issued October 26, 1995.

This is the Part 70 operating permit for the facility.

**II. Origin**

A permit application and Emission Inventory Questionnaire were submitted by CII Carbon, L.L.C. on October 14, 1996 requesting a Part 70 operating permit. A revised application and EIQ dated September 24, 2002 was received, and additional information dated January 6, 2006 was also received.

**III. Description**

Gramercy Coke Plant produces calcined coke from green coke. Green petroleum coke is received by trucks and barges from where it is brought to the stockpile and then transferred to a storage bin. Residual moisture and volatile compounds are removed from the green coke using a natural gas-fired countercurrent rotary kiln. The calcined coke is discharged from the kiln into a rotary cooler where it is quenched with water. The product is treated for dust control in a screw conveyor with a chemical wetting agent and is transferred to the calcined coke storage dome for loading into ships.

Flue gases from the kiln are routed into a settling chamber and then to a pyroscrubber for destruction of particulate matter (PM) and volatile organic compounds (VOCs). The gases are then directed through the waste heat recovery boiler (WHB) to produce steam, which is sold to an adjacent facility. Exhaust from the WHB exits through a multiclone before entering the atmosphere.

In the fourth quarter of 2005, CII Carbon conducted an engineering study in order to better understand and characterize the sulfur dioxide emissions from the waste heat boiler (EQT 003) and the pyroscrubber (EQT 004). The data showed sulfur dioxide emissions to be higher than previously permitted. Revisions were made in this permit to reflect the discrepancy.

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**Gramercy, St. James Parish, Louisiana**

This is the initial Part 70 operating permit for the facility. Changes associated with this permit include updated emissions and the addition of existing minor sources not identified in previous permits. Also, the operating hours have been increased from 8,400 hours per year to 8,760 hour per year to provide greater operating flexibility.

Estimated emissions in tons per year are as follows:

<u>Pollutant</u>	<u>Before</u>	<u>After</u>	<u>Change</u>
PM <sub>10</sub>	326.80	334.59	+ 7.79
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NO <sub>x</sub>	378.00	394.02	+ 16.02
CO	< 0.01	0.02	+ 0.02
VOC	0.84	6.99	+ 6.15
SO <sub>3</sub>	105.00	110.00	+ 5.00

\* This is not an actual increase. It is due to revised calculations based on an engineering study conducted November 2005.

**IV. Type of Review**

This permit was reviewed for compliance with 40 CFR 70 and the Louisiana Air Quality Regulations. Prevention of Significant Deterioration (PSD), New Source Performance Standards (NSPS), and National Emission Standards for Hazardous Air Pollutants (NESHAP) do not apply.

This facility is a minor source of toxic air pollutants (TAPs) pursuant to LAC 33:III.Chapter 51.

**V. Credible Evidence**

Notwithstanding any other provisions of any applicable rule or regulation or requirement of this permit that state specific methods that may be used to assess compliance with applicable requirements, pursuant to 40 CFR Part 70 and EPA's Credible Evidence Rule, 62 Fed. Reg. 8314 (Feb. 24, 1997), any credible evidence or information relevant to whether a source would have been in compliance with applicable requirements if the appropriate performance

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or compliance test or procedure had been performed shall be considered for purposes of Title V compliance certifications. Furthermore, for purposes of establishing whether or not a person has violated or is in violation of any emissions limitation or standard or permit condition, nothing in this permit shall preclude the use, including the exclusive use, by any person of any such credible evidence or information.

**VI. Public Notice**

A notice requesting public comment on the permit was published in *The Advocate*, Baton Rouge, on <date>, 200X; and in the <local paper>, <local town>, on <date>, 200X. A copy of the public notice was mailed to concerned citizens listed in the Office of Environmental Services Public Notice Mailing List on <date>. The draft permit was also submitted to US EPA Region VI on <date>. All comments will be considered prior to the final permit decision.

**VII. Effects on Ambient Air**

Dispersion Model(s) Used: ISCST3 (screen)

Pollutant	Time Period	Calculated Maximum Ground Level Concentration	Louisiana Toxic Air Pollutant Ambient Air Quality Standard or (National Ambient Air Quality Standard {NAAQS})
SO <sub>2</sub>	Annual Average	7.29 µg/m <sup>3</sup>	(80 µg/m <sup>3</sup> )
	24 hr Average	77.00 µg/m <sup>3</sup>	(365 µg/m <sup>3</sup> )
	3 hr Average	282.00 µg/m <sup>3</sup>	(1300 µg/m <sup>3</sup> )

**VIII. General Condition XVII Activities**

Work Activity	Schedule	PM <sub>10</sub>	Emission Rates - tons			
			SO <sub>2</sub>	NO <sub>x</sub>	CO	VOC
NA						

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**IX. Insignificant Activities**

ID No.:	Description	Citation
-	Dedust Oil Tank No. 2 (3,000 gallons)	Insignificant Activity per LAC 33:III.501.B.5.A.3.
-	Diesel Fuel Tank No. 1 (1,000 gallons)	Insignificant Activity per LAC 33:III.501.B.5.A.3.

**LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY**

Gramercy Coke Plant  
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**X. Table 1. Applicable Louisiana and Federal Air Quality Requirements**

ID No.: Description		LAC 33:III,Chapter																	
		5*	9	11	13	15	2103	2104*	2107	2111	2113	2115	2116*	22	29*	51*	53	56	59
	Plant Wide	1	1	1	1						1			3		3		1	3
ARE 2	CK-XX-2 Green Coke Storage Pile				1														
EQT 1	2-72 Cooler Scrubber				1														
EQT 3	7-72 Waste Heat Boiler			1	1	1													
EQT 4	8-72 Pyroscrubber			1	1	1													
EQT 5	CCT1-02 Calined Coke Storage Tank				1														
EQT 6	CT1-02 Cooling Tower No. 1																		
EQT 7	DD1-02 Dedust Oil Tank 1						3												
EQT 8	AE1-02 Auxiliary Engine No. 1				1														
EQT 9	AE2-02 Auxiliary Engine No. 2				1														
EQT 10	4-72 Calcined Coke Storage Domes				1														
EQT 11	6-72 Dock Load-Out Spout				1														
FUG 1	3-72 Calcined Load-In				1														
FUG 2	1-05 Dedust Oil Fugitives																		
GRP 002	78CAP-02 Waste Heat Boiler/Pyroscrubber CAP																		

\* The regulations indicated above are State Only regulations except for LAC 33:III.501.C.6 Limitations that specifically state that the regulation is Federally Enforceable.

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## KEY TO MATRIX

- 1 -The regulations have applicable requirements that apply to this particular emission source.  
-The emission source may have an exemption from control stated in the regulation. The emission source may not have to be controlled but may have monitoring, recordkeeping, or reporting requirements.
- 2 -The regulations have applicable requirements that apply to this particular emission source but the source is currently exempt from these requirements due to meeting a specific criterion, such as it has not been constructed, modified or reconstructed since the regulations have been in place. If the specific criteria changes the source will have to comply at a future date.
- 3 -The regulations apply to this general type of emission source (i.e. vents, furnaces, towers, and fugitives) but do not apply to this particular emission source.

Blank – The regulations clearly do not apply to this type of emission source.

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ID No.:	Description	40 CFR 60 NSPS						40 CFR 61			40 CFR 63 NESHAP				40 CFR				
		K	Ka	Kb	Db	Dc	GG	KKK	A	J	V	A	Q	SS	VV	HHH	52	68	82
	Plant Wide																		1
ARE 2	CK-XX-2 Green Coke Storage Pile																		
EQT 1	2-72 Cooler Scrubber																		
EQT 3	7-72 Waste Heat Boiler																		
EQT 4	8-72 Pyroscrubber																		
EQT 5	CCT1-02 Calined Coke Storage Tank																		
EQT 6	CT1-02 Cooling Tower No. 1											3							
EQT 7	DD1-02 Dedust Oil Tank 1	3	3	3															
EQT 8	AE1-02 Auxiliary Engine No. 1																		
EQT 9	AE2-02 Auxiliary Engine No. 2																		
EQT 10	4-72 Calcined Coke Storage Domes																		
EQT 11	6-72 Dock Load-Out Spout																		
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- 3 -The regulations apply to this general type of emission source (i.e. vents, furnaces, towers, and fugitives) but do not apply to this particular emission source.

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**XI. Table 2. Explanation for Exemption Status or Non-Applicability of a Source**

ID No:	Requirement	Notes
Plant Wide	Comprehensive Toxic Air Pollutant Emission Control Program [LAC 33:III. Chapter 51]	DOES NOT APPLY. Minor source of Toxic Air Pollutants.
	Chemical Accident Prevention and Minimization of Consequences [LAC 33:III. Chapter 59]	DOES NOT APPLY. Per LAC 33:III.5907 & 5911, facility does not store listed chemicals in quantities greater than threshold amounts.
	Control of Emissions of Nitrogen Oxides [LAC 33:III. Chapter 22]	DOES NOT APPLY. Facility is not an affected facility per LAC 33:III.2201.A
EQT 6 Cooling Tower No. 1	NESHAP Subpart Q National Emission Standards for Hazardous Air Pollutants (HAPs) for Industrial Cooling Towers [40 CFR 63.400]	DOES NOT APPLY. The cooling towers do not use chromium based water treatment chemicals and is not a major source of Hazardous Air Pollutants.
EQT 7 Dedust Oil Tank 1	Storage of Volatile Organic Compounds [LAC 33:III.2103.A]	DOES NOT APPLY. Maximum true vapor pressure is less than 1.5 psia.
	NSPS Subpart K- Standards of Performance for Storage Vessels for Volatile Liquids [40 CFR 60.110]	DOES NOT APPLY. Tank capacity is less than 40,000 gallons and constructed/modified prior to June 11, 1973.
	NSPS Subpart Ka- Standards of Performance for Storage Vessels for Volatile Liquids [40 CFR 60.110a]	DOES NOT APPLY. Tank capacity is less than 40,000 gallons and constructed/modified prior to May 18, 1978.

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XI. Table 2. Explanation for Exemption Status or Non-Applicability of a Source		
ID No:	Requirement	Notes
EQT 7 Dedust Oil Tank 1 (Cont'd)	NSPS Subpart Kb- Standards of Performance for Storage Vessels for Volatile Liquids [40 CFR 60.110b]	DOES NOT APPLY. Constructed/modified prior to July 23, 1984.

The above table provides explanation for both the exemption status or non-applicability of a source cited by 1, 2 or 3 in the matrix presented in Section X (Table 1) of this permit.

## 40 CFR PART 70 GENERAL CONDITIONS

- A. The term of this permit shall be five (5) years from date of issuance. An application for a renewal of this 40 CFR Part 70 permit shall be submitted to the administrative authority no later than six months prior to the permit expiration date. Should a complete permit application not be submitted six months prior to the permit expiration date, a facility's right to operate is terminated pursuant to 40 CFR Section 70.7(c)(ii). Operation may continue under the conditions of this permit during the period of the review of the application for renewal. [LAC 33:III.507.E.1, E.3, E.4, reference 40 CFR 70.6(a)(2)]
- B. The conditions of this permit are severable; and if any provision of this permit or the application of any provision of this permit to any circumstance is held invalid, the application of such provision to other circumstances, and the remainder of this permit, shall not be affected thereby. [Reference 40 CFR 70.6(a)(5)]
- C. Permittee shall comply with all conditions of the 40 CFR Part 70 permit. Any permit noncompliance constitutes a violation of the Clean Air Act and is grounds for enforcement action; for permit termination, revocation and reissuance, or modification; or for denial of a permit renewal application. This permit may be modified, revoked, reopened and reissued, or terminated for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition. [LAC 33:III.507.B.2, reference 40 CFR 70.6(a)(6)(i) & (iii)]
- D. It shall not be a defense for a permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit. [Reference 40 CFR 70.6(a)(6)(ii)]
- E. This permit does not convey any property rights of any sort, or an exclusive privilege. [Reference 40 CFR 70.6(a)(6)(iv)]
- F. The permittee shall furnish to the permitting authority, within a reasonable time, any information that the permitting authority may request in writing to determine whether cause exists for modifying, revoking, and reissuing, or terminating the permit or to determine compliance with the permit. Upon request, the permittee shall also furnish to the permitting authority copies of records required to be kept by the permit or, for information claimed to be confidential, the permittee may furnish such records directly to the Administrator along with a claim of confidentiality. A claim of confidentiality does not relieve the permittee of the requirement to provide the information. [LAC 33:III.507.B.2, 517.F, reference 40 CFR 70.6(a)(6)(v)]
- G. Permittee shall pay fees in accordance with LAC 33:III.Chapter 2 and 40 CFR Section 70.6(a)(7). [LAC 33:III.501.C.2, reference 40 CFR 70.6(a)(7)]
- H. Upon presentation of credentials and other documents as may be required by law, the permittee shall allow the permitting authority or authorized representative to perform the following:
  - 1. enter upon the permittee's premises where a 40 CFR Part 70 source is located or emission-related activity is conducted, or where records must be kept under the conditions of the permit [LAC 33:III.507.H.2, reference 40 CFR 70.6(c)(2)(i)];

## 40 CFR PART 70 GENERAL CONDITIONS

2. have access to and copy, at reasonable times, any records that must be kept under the conditions of the permit [LAC 33:III.507.H.2, reference 40 CFR 70.6(c)(2)(ii)];
  3. inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under the permit [LAC 33:III.507.H.2, reference 40 CFR 70.6(c)(2)(iii)]; and
  4. as authorized by the Clean Air Act, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit or applicable requirements. [LAC 33:III.507.H.2, reference 40 CFR 70.6(c)(2)(iv)]
- I. All required monitoring data and supporting information shall be kept available for inspection at the facility or alternate location approved by the agency for a period of at least five (5) years from the date of the monitoring sample, measurement, report, or application. Supporting information includes calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and all reports required by the permit.  
[Reference 40 CFR 70.6(a)(3)(ii)(B)]
- J. Records of required monitoring shall include the following:
1. the date, place as defined in the permit, and time of sampling or measurements;
  2. the date(s) analyses were performed;
  3. the company or entity that performed the analyses;
  4. the analytical techniques or methods used;
  5. the results of such analyses; and
  6. the operating conditions as existing at the time of sampling or measurement.
- [Reference 40 CFR 70.6(a)(3)(ii)(A)]
- K. Permittee shall submit at least semiannually, reports of any required monitoring, clearly identifying all instances of deviations from permitted monitoring requirements, certified by a responsible company official. For previously reported deviations, in lieu of attaching the individual deviation reports, the semiannual report may clearly reference the communication(s)/correspondence(s) constituting the prior report, including the date the prior report was submitted. The semiannual reports shall be submitted to the Office of Environmental Compliance, Surveillance Division by March 31 for the preceding period encompassing July through December and September 30 for the preceding period encompassing January through June. Any quarterly deviation report required to be submitted by March 31 or September 30 in accordance with Part 70 General Condition R may be consolidated with the semi-annual reports required by this general condition as long as the report clearly indicates this and all required information is included and clearly delineated in the consolidated report. [LAC 33:III.507.H, reference 40 CFR 70.6(a)(3)(iii)(A)]
- L. The permittee shall submit at least semiannual reports on the status of compliance pursuant to 40 CFR Section 70.5 (c) (8) and a progress report on any applicable schedule of compliance pursuant to 40 CFR Section 70.6 (c) (4). [LAC 33:III.507.H.1, reference 40 CFR 70.6(c)(4)]
- M. Compliance certifications per LAC 33:III.507.H.5 shall be submitted to the Administrator as well as the permitting authority. For previously reported compliance deviations, in lieu of

## 40 CFR PART 70 GENERAL CONDITIONS

attaching the individual deviation reports, the annual report may clearly reference the communication(s)/correspondence(s) constituting the prior report, including the date the prior report was submitted. The compliance certifications shall be submitted to the Office of Environmental Compliance, Surveillance Division by March 31 for the preceding calendar year. [LAC 33:III.507.H.5, reference 40 CFR 70.6(c)(5)(iv)]

- N. If the permittee seeks to reserve a claim of an affirmative defense as provided in LAC 33:III.507.J.2, the permittee shall, in addition to any emergency or upset provisions in any applicable regulation, notify the permitting authority within 2 working days of the time when emission limitations were exceeded due to the occurrence of an upset. In the event of an upset, as defined under LAC 33:III.507.J, which results in excess emissions, the permittee shall demonstrate through properly signed, contemporaneous operating logs, or other relevant evidence that: 1) an emergency occurred and the cause was identified; 2) the permitted facility was being operated properly at the time; and 3) during the emergency the permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standard or requirement of the permit. [LAC 33:III.507.J.2, reference 40 CFR 70.6(g)(3)(iv) & (i-iii)]
- O. Permittee shall maintain emissions at a level less than or equal to that provided for under the allowances that the 40 CFR Part 70 source lawfully holds under Title IV of the Clean Air Act or the regulations promulgated thereunder. No permit revision shall be required for increases in emissions that are authorized by allowances acquired pursuant to the acid rain program, provided that such increases do not require a permit revision under any other applicable requirement. No limit shall be placed on the number of allowances held by the source. The source may not, however, use allowances as a defense to noncompliance with any other applicable requirement. Any such allowance shall be accounted for according to the procedures established in regulations promulgated under Title IV of the Clean Air Act. [Reference 40 CFR 70.6(a)(4)]
- P. Any permit issued pursuant to 40 CFR Part 70 may be subject to reopening prior to the expiration of the permit for any of the conditions specified in 40 CFR Section 70.7(f) or LAC 33:III.529. [LAC 33:III.529.A-B, reference 40 CFR 70.7(f)]
- Q. Permittee may request an administrative amendment to the permit to incorporate test results from compliance testing if the following criteria are met:
1. the changes are a result of tests performed upon start-up of newly constructed, installed, or modified equipment or operations;
  2. increases in permitted emissions will not exceed five tons per year for any regulated pollutant;
  3. increases in permitted emissions of Louisiana toxic air pollutants or of federal hazardous air pollutants would not constitute a modification under LAC 33:III. Chapter 51 or under Section 112 (g) of the Clean Air Act;
  4. changes in emissions would not require new source review for prevention of significant deterioration or nonattainment and would not trigger the applicability of any federally applicable requirement;

## 40 CFR PART 70 GENERAL CONDITIONS

5. changes in emissions would not qualify as a significant modification; and
  6. the request is submitted no later than 12 months after commencing operation. [LAC 33:III.523.A, reference 40 CFR 70.7(d)]
- R. Permittee shall submit prompt reports of all permit deviations as specified below to the Office of Environmental Compliance, Surveillance Division. All such reports shall be certified by a responsible official in accordance with 40 CFR 70.5(d).
1. A written report shall be submitted within 7 days of any emission in excess of permit requirements by an amount greater than the Reportable Quantity established for that pollutant in LAC 33.I.Chapter 39.
  2. A written report shall be submitted within 7 days of the initial occurrence of any emission in excess of permit requirements, regardless of the amount, where such emission occurs over a period of seven days or longer.
  3. A written report shall be submitted quarterly to address all permit deviations not included in paragraphs 1 or 2 above. Unless required by an applicable reporting requirement, a written report is not required during periods in which there is no deviation. The quarterly deviation reports submitted on March 31 and September 30 may be consolidated with the semi-annual reports required by Part 70 General Condition K as long as the report clearly indicates this and all required information is included and clearly delineated in the consolidated report. For previously reported permit deviations, in lieu of attaching the individual deviation reports, the quarterly report may clearly reference the communication(s)/correspondence(s) constituting the prior report, including the date the prior report was submitted. The schedule for submittal of quarterly reports shall be no later than the dates specified below for any permit deviations occurring during the corresponding specified calendar quarter:
    - a. Report by June 30 to cover January through March
    - b. Report by September 30 to cover April through June
    - c. Report by December 31 to cover July through September
    - d. Report by March 31 to cover October through December
  4. Any written report submitted in advance of the timeframes specified above, in accordance with an applicable regulation, may serve to meet the reporting requirements of this condition provided such reports are certified in accordance with 40 CFR 70.5(d) and contain all information relevant to the permit deviation. Reporting under this condition does not relieve the permittee from the reporting requirements of any applicable regulation, including LAC 33.I.Chapter 39, LAC 33.III.Chapter 9, and LAC 33.III.5107. [Reference 40 CFR 70.6(a)(3)(iii)(B)]
- S. Permittee shall continue to comply with applicable requirements on a timely basis, and will meet on a timely basis applicable requirements that become effective during the permit term. [Reference 40 CFR 70.5(c)(8)(iii)]

## 40 CFR PART 70 GENERAL CONDITIONS

- T. The permittee shall comply with the standards for recycling and emissions reduction pursuant to 40 CFR Part 82, Subpart F, except as provided for Motor Vehicle Air Conditioners (MVACs) in Subpart B:
1. Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to 40 CFR 82.156;
  2. Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158;
  3. Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161;
  4. Persons disposing of small appliances, MVACs, and MVAC-like appliances must comply with recordkeeping requirements pursuant to 40 CFR 82.166. ("MVAC-like appliance" as defined at 40 CFR 82.152);
  5. Persons owning commercial or industrial process refrigeration equipment must comply with the leak repair requirements pursuant to 40 CFR 82.156; and
  6. Owners/operators of appliances normally containing 50 or more pounds of refrigerant must keep records of refrigerant purchased and added to such appliances pursuant to 40 CFR 82.166. [Reference 40 CFR 82, Subpart F]
- U. If the permittee performs a service on motor (fleet) vehicles when this service involves ozone-depleting substance refrigerant (or regulated substitute substance) in the motor vehicle air conditioner (MVAC), the permittee is subject to all the applicable requirements as specified in 40 CFR Part 82, Subpart B, Servicing of Motor Vehicle Air Conditioners.

The term "motor vehicle" as used in Subpart B does not include a vehicle in which final assembly of the vehicle has not been completed. The term "MVAC" as used in Subpart B does not include the air-tight sealed refrigeration system used as refrigerated cargo, or system used on passenger buses using HCFC-22 refrigerant. [Reference 40 CFR 82, Subpart B]

- V. Data availability for continuous monitoring or monitoring to collect data at specific intervals: Except for monitoring malfunctions, associated repairs, and required quality assurance or control activities (including calibration checks and required zero and span adjustments), the permittee shall conduct all monitoring in continuous operation (or shall collect data at all required intervals) at all times that the emissions unit is operating. For purposes of reporting monitoring deviations under Part 70 General Conditions K and R, and unless otherwise provided for in the Specific Requirements (or Table 3) of this permit, the minimum degree of data availability shall be at least 90% (based on a monthly average) of the operating time of the emissions unit or activity being monitored. This condition does not apply to Leak Detection and Repair (LDAR) programs for fugitive emissions (e.g., 40 CFR 60 Subpart VV, 40 CFR 63 Subpart H).

**LOUISIANA AIR EMISSION PERMIT  
GENERAL CONDITIONS**

- I. This permit is issued on the basis of the emissions reported in the application for approval of emissions and in no way guarantees that the design scheme presented will be capable of controlling the emissions to the type and quantities stated. Failure to install, properly operate and/or maintain all proposed control measures and/or equipment as specified in the application and supplemental information shall be considered a violation of the permit and LAC 33:III.501. If the emissions are determined to be greater than those allowed by the permit (e.g. during the shakedown period for new or modified equipment) or if proposed control measures and/or equipment are not installed or do not perform according to design efficiency, an application to modify the permit must be submitted. All terms and conditions of this permit shall remain in effect unless and until revised by the permitting authority.
- II. The permittee is subject to all applicable provisions of the Louisiana Air Quality Regulations. Violation of the terms and conditions of the permit constitutes a violation of these regulations.
- III. The Emission Rates for Criteria Pollutants, Emission Rates for TAP/HAP & Other Pollutants, and Specific Requirements sections or, where included, Emission Inventory Questionnaire sheets establish the emission limitations and are a part of the permit. Any operating limitations are noted in the Specific Requirements or, where included, Tables 2 and 3 of the permit. The synopsis is based on the application and Emission Inventory Questionnaire (EIQ) dated October 14, 1996. A revised application and EIQ dated September 24, 2002 was received, and additional information dated January 6, 2006 was also received.
- IV. This permit shall become invalid, for the sources not constructed, if:
  - A. Construction is not commenced, or binding agreements or contractual obligations to undertake a program of construction of the project are not entered into, within two (2) years (18 months for PSD permits) after issuance of this permit, or;
  - B. If construction is discontinued for a period of two (2) years (18 months for PSD permits) or more.

The administrative authority may extend this time period upon a satisfactory showing that an extension is justified.

This provision does not apply to the time period between construction of the approved phases of a phased construction project. However, each phase must commence construction within two (2) years (18 months for PSD permits) of its projected and approved commencement date.
- V. The permittee shall submit semiannual reports of progress outlining the status of construction, noting any design changes, modifications or alterations in the construction schedule which have or may have an effect on the emission rates or ambient air quality levels. These reports shall continue to be submitted until such time as construction is certified as being complete. Furthermore, for any significant change in the design, prior approval shall be obtained from the Office of Environmental Services, Air Permits Division.
- VI. The permittee shall notify the Department of Environmental Quality, Office of Environmental Services, Air Permits Division within ten (10) calendar days from the date that construction is

## LOUISIANA AIR EMISSION PERMIT GENERAL CONDITIONS

certified as complete and the estimated date of start-up of operation. The appropriate Regional Office shall also be so notified within the same time frame.

- VII. Any emissions testing performed for purposes of demonstrating compliance with the limitations set forth in paragraph III shall be conducted in accordance with the methods described in the Specific Conditions and, where included, Tables 1, 2, 3, 4, and 5 of this permit. Any deviation from or modification of the methods used for testing shall have prior approval from the Office of Environmental Assessment, Air Quality Assessment Division.
- VIII. The emission testing described in paragraph VII above, or established in the specific conditions of this permit, shall be conducted within sixty (60) days after achieving normal production rate or after the end of the shakedown period, but in no event later than 180 days after initial start-up (or restart-up after modification). The Office of Environmental Assessment, Air Quality Assessment Division shall be notified at least (30) days prior to testing and shall be given the opportunity to conduct a pretest meeting and observe the emission testing. The test results shall be submitted to the Air Quality Assessment Division within sixty (60) days after the complete testing. As required by LAC 33:III.913, the permittee shall provide necessary sampling ports in stacks or ducts and such other safe and proper sampling and testing facilities for proper determination of the emission limits.
- IX. The permittee shall, within 180 days after start-up and shakedown of each project or unit, report to the Office of Environmental Compliance, Surveillance Division any significant difference in operating emission rates as compared to those limitations specified in paragraph III. This report shall also include, but not be limited to, malfunctions and upsets. A permit modification shall be submitted, if necessary, as required in Condition I.
- X. The permittee shall retain records of all information resulting from monitoring activities and information indicating operating parameters as specified in the specific conditions of this permit for a minimum of at least five (5) years.
- XI. If for any reason the permittee does not comply with, or will not be able to comply with, the emission limitations specified in this permit, the permittee shall provide the Office of Environmental Compliance, Surveillance Division with a written report as specified below.
- A. A written report shall be submitted within 7 days of any emission in excess of permit requirements by an amount greater than the Reportable Quantity established for that pollutant in LAC 33.I.Chapter 39.
  - B. A written report shall be submitted within 7 days of the initial occurrence of any emission in excess of permit requirements, regardless of the amount, where such emission occurs over a period of seven days or longer.
  - C. A written report shall be submitted quarterly to address all emission limitation exceedances not included in paragraphs A or B above. The schedule for submittal of quarterly reports shall be no later than the dates specified below for any emission limitation exceedances occurring during the corresponding specified calendar quarter:
    - 1. Report by June 30 to cover January through March
    - 2. Report by September 30 to cover April through June
    - 3. Report by December 31 to cover July through September

**LOUISIANA AIR EMISSION PERMIT  
GENERAL CONDITIONS**

4. Report by March 31 to cover October through December
- D. Each report submitted in accordance with this condition shall contain the following information:
1. Description of noncomplying emission(s);
  2. Cause of noncompliance;
  3. Anticipated time the noncompliance is expected to continue, or if corrected, the duration of the period of noncompliance;
  4. Steps taken by the permittee to reduce and eliminate the noncomplying emissions; and
  5. Steps taken by the permittee to prevent recurrences of the noncomplying emissions.
- E. Any written report submitted in advance of the timeframes specified above, in accordance with an applicable regulation, may serve to meet the reporting requirements of this condition provided all information specified above is included. For Part 70 sources, reports submitted in accordance with Part 70 General Condition R shall serve to meet the requirements of this condition provided all specified information is included. Reporting under this condition does not relieve the permittee from the reporting requirements of any applicable regulation, including LAC 33.I.Chapter 39, LAC 33.III.Chapter 9, and LAC 33.III.5107.
- XII. Permittee shall allow the authorized officers and employees of the Department of Environmental Quality, at all reasonable times and upon presentation of identification, to:
- A. Enter upon the permittee's premises where regulated facilities are located, regulated activities are conducted or where records required under this permit are kept;
  - B. Have access to and copy any records that are required to be kept under the terms and conditions of this permit, the Louisiana Air Quality Regulations, or the Act;
  - C. Inspect any facilities, equipment (including monitoring methods and an operation and maintenance inspection), or operations regulated under this permit; and
  - D. Sample or monitor, for the purpose of assuring compliance with this permit or as otherwise authorized by the Act or regulations adopted thereunder, any substances or parameters at any location.
- XIII. If samples are taken under Section XII.D. above, the officer or employee obtaining such samples shall give the owner, operator or agent in charge a receipt describing the sample obtained. If requested prior to leaving the premises, a portion of each sample equal in volume or weight to the portion retained shall be given to the owner, operator or agent in charge. If an analysis is made of such samples, a copy of the analysis shall be furnished promptly to the owner, operator or agency in charge.
- XIV. The permittee shall allow authorized officers and employees of the Department of Environmental Quality, upon presentation of identification, to enter upon the permittee's

**LOUISIANA AIR EMISSION PERMIT  
GENERAL CONDITIONS**

premises to investigate potential or alleged violations of the Act or the rules and regulations adopted thereunder. In such investigations, the permittee shall be notified at the time entrance is requested of the nature of the suspected violation. Inspections under this subsection shall be limited to the aspects of alleged violations. However, this shall not in any way preclude prosecution of all violations found.

- XV. The permittee shall comply with the reporting requirements specified under LAC 33:III.919 as well as notification requirements specified under LAC 33:III.927.
- XVI. In the event of any change in ownership of the source described in this permit, the permittee and the succeeding owner shall notify the Office of Environmental Services, Air Permits Division, within ninety (90) days after the event, to amend this permit.
- XVII. Very small emissions to the air resulting from routine operations, that are predictable, expected, periodic, and quantifiable and that are submitted by the permitted facility and approved by the Air Permits Division are considered authorized discharges. Approved activities are noted in the General Condition XVII Activities List of this permit. To be approved as an authorized discharge, these very small releases must:
1. Generally be less than 5 TPY
  2. Be less than the minimum emission rate (MER)
  3. Be scheduled daily, weekly, monthly, etc., or
  4. Be necessary prior to plant startup or after shutdown [line or compressor pressuring/depressuring for example]

These releases are not included in the permit totals because they are small and will have an insignificant impact on air quality. This general condition does not authorize the maintenance of a nuisance, or a danger to public health and safety. The permitted facility must comply with all applicable requirements, including release reporting under LAC 33:I.3901.

- XVIII. Provisions of this permit may be appealed in writing pursuant to La. R.S. 30:2024(A) within 30 days from receipt of the permit. Only those provisions specifically appealed will be suspended by a request for hearing, unless the secretary or the assistant secretary elects to suspend other provisions as well. Construction cannot proceed except as specifically approved by the secretary or assistant secretary. A request for hearing must be sent to the following:

Attention: Office of the Secretary, Legal Services Division  
La. Dept. of Environmental Quality  
Post Office Box 4302  
Baton Rouge, Louisiana 70821-4302

- XIX. Certain Part 70 general conditions may duplicate or conflict with state general conditions. To the extent that any Part 70 conditions conflict with state general conditions, then the Part 70 general conditions control. To the extent that any Part 70 general conditions duplicate any state general conditions, then such state and Part 70 provisions will be enforced as if there is only one condition rather than two conditions.

### General Information

AI ID: 32804 CII Carbon LLC - Gramercy Coke Plant

Activity Number: PER19960004

Permit Number: 2560-00047-V0

Air - Title V Regular Permit Initial

Also Known As:	ID	Name	User Group	Start Date
	2560-00047	CII Carbon LLC - Gramercy Coke Plant	CDS Number	08-05-2002
	2560-0015	CII Carbon LLC - Gramercy Coke Plant	Emission Inventory	03-03-2004
	72-1130004	Federal Tax ID	Federal Tax ID	11-21-1999
	LA0087777	LPDES #	LPDES Permit #	06-25-2003
	WP3397	WPC State Permit Number	LWDPS Permit #	06-25-2003
	GD-093-2838	Site ID #	Solid Waste Facility No.	08-20-2001
	16979	Calciner Industries Inc	TEMPO Merge	02-19-2001
	20103	Calciner Industries Inc	TEMPO Merge	11-14-2000
	WQC GC 050209-02	Water Quality Certification #	Water Certification	02-09-2005

**Physical Location:**

1140 Jefferson Hwy  
Gramercy, LA 70052

Main Phone: 2258698010

**Mailing Address:**

2021 Lakeshore Dr Ste 200  
New Orleans, LA 70122

**Location of Front Gate:**

30° 3' 24" 91 hundredths latitude, 90° 40' 13" 13 hundredths longitude, Coordinate Method: Interpolation - Map, Coordinate Datum: NAD27

**Related People:**

Name	Mailing Address	Phone (Type)	Relationship
Barbara Guynes	2021 Lakeshore Dr Ste 200 New Orleans, LA 70122	5042184300 (WP)	Air Permit Contact For
Steve Rowland	2021 Lakeshore Dr Ste 200 New Orleans, LA 70122	5042184300 (WP)	Responsible Official for

**Related Organizations:**

Name	Address	Phone (Type)	Relationship
CII Carbon LLC	2021 Lakeshore Dr Ste 200 New Orleans, LA 70122	5042184300 (WP)	Owns
CII Carbon LLC	2021 Lakeshore Dr Ste 200 New Orleans, LA 70122	5042184300 (WP)	Air Billing Party for
CII Carbon LLC	2021 Lakeshore Dr Ste 200 New Orleans, LA 70122	5042184300 (WP)	Water Billing Party for
CII Carbon LLC	2021 Lakeshore Dr Ste 200 New Orleans, LA 70122	5042184300 (WP)	Solid Waste Billing Party for

**SIC Codes:**

2999, Petroleum and coal products, nec

Note: This report entitled "General Information" contains a summary of facility-level information contained in LDEQ's TEMPO database for this facility and is not considered a part of the permit. Please review the information contained in this document for accuracy and completeness. If any changes are required or if you have questions regarding this document, you may contact Mr. David Ferrand, Environmental Assistance Division, at (225) 219-3247 or email your changes to facupdate@la.gov.

# INVENTORIES

AI ID: 32804 - CII Carbon LLC - Gramercy Coke Plant

Activity Number: PER19960004

Permit Number: 2560-00047-V0

Air - Title V Regular Permit Initial

## Subject Item Inventory:

ID	Description	Tank Volume	Max. Operating Rate	Normal Operating Rate	Contents	Operating Time
ARE002	CK-XX-2 Green Coke Storage Pile					8760 hr/yr (All Year)
EQT001	2-72 Cooler Scrubber		49 tons/hr	44 tons/hr		8760 hr/yr (All Year)
EQT003	7-72 Waste Heat Boiler		25.2 MM BTU/hr	25.2 MM BTU/hr		8260 hr/yr (All Year)
EQT004	8-72 Pyroscrubber		25.2 MM BTU/hr	25.2 MM BTU/hr		500 hr/yr (All Year)
EQT005	CCT1-02 Calcined Coke Storage Tank		275000 tons/yr	275000 tons/yr		8760 hr/yr (All Year)
EQT006	CT1-02 Cooling Tower No. 1		1150 gallons/min	1150 gallons/min		8760 hr/yr (All Year)
EQT007	DD1-02 Dedust Oil Tank 1	15000 gallons				8760 hr/yr (All Year)
EQT008	AE1-02 Auxiliary Engine No. 1		20 horsepower	20 horsepower		100 hr/yr (All Year)
EQT009	AE2-02 Auxiliary Engine No. 2		20 horsepower	20 horsepower		50 hr/yr (All Year)
EQT010	4-72 Calcined Coke Storage Domes		200 tons/hr	150 tons/hr		6250 hr/yr (All Year)
EQT011	6-72 Dock Load-Out Spout		550 tons/hr	350 tons/hr		3125 hr/yr (All Year)
FUG001	3-72 Calcined Load-In		150 tons/hr	75 tons/hr		4667 hr/yr (All Year)
FUG002	1-05 Dedust Oil Fugitives		1.52 MM tons/yr	1.52 MM tons/yr		8760 hr/yr (All Year)

## Subject Item Groups:

ID	Description	Included Components (from Above)				
GRP001		ARE2 CK-XX-2 Green Coke Storage Pile				
GRP001		EQT1 2-72 Cooler Scrubber				
GRP001		EQT3 7-72 Waste Heat Boiler				
GRP001		EQT4 8-72 Pyroscrubber				
GRP001		EQT5 CCT1-02 Calcined Coke Storage Tank				
GRP001		EQT6 CT1-02 Cooling Tower No. 1				
GRP001		EQT7 DD1-02 Dedust Oil Tank 1				
GRP001		EQT8 AE1-02 Auxiliary Engine No. 1				
GRP001		EQT9 AE2-02 Auxiliary Engine No. 2				
GRP001		EQT10 4-72 Calcined Coke Storage Domes				
GRP001		EQT11 6-72 Dock Load-Out Spout				
GRP001		FUG1 3-72 Calcined Load-In				
GRP001		FUG2 1-05 Dedust Oil Fugitives				
GRP002	78CAP-02 Waste Heat Boiler/Pyroscrubber CAP	EQT3 7-72 Waste Heat Boiler				
GRP002	78CAP-02 Waste Heat Boiler/Pyroscrubber CAP	EQT4 8-72 Pyroscrubber				

## Relationships:

## Stack Information:

ID	Velocity (ft/sec)	Flow Rate (cubic ft/min-actual)	Diameter (feet)	Discharge Area (square feet)	Height (feet)	Temperature (oF)
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## INVENTORIES

AI ID: 32804 - CII Carbon LLC - Gramercy Coke Plant

Activity Number: PER19960004

Permit Number: 2560-00047-V0

Air - Title V Regular Permit Initial

### Stack Information:

ID	Velocity (ft/sec)	Flow Rate (cubic ft/min-actual)	Diameter (feet)	Discharge Area (square feet)	Height (feet)	Temperature (oF)
EQT001	2-72 Cooler Scrubber	38000	5		50	185
EQT003	7-72 Waste Heat Boiler	171000	7.9		111	370
EQT004	8-72 Pyroscrubber	243500	16.5		171	2200
EQT005	CCT1-02 Calcined Coke Storage Tank	70	.5		80	125
EQT010	4-72 Calcined Coke Storage Domes				130	125
EQT011	6-72 Dock Load-Out Spout		30		80	125
FUG001	3-72 Calcined Load-In					125

### Fee Information:

Subj Item Id	Multiplier	Units Of Measure	Fee Desc
GRP001	275	1,000 Ton/Yr	0770 - Petroleum Coke Calcining (Rated Capacity)

# EMISSION RATES FOR CRITERIA POLLUTANTS

AI ID: 32804 - CII Carbon LLC - Gramercy Coke Plant

Activity Number: PER19960004

Permit Number: 2560-00047-V0

Air - Title V Regular Permit Initial

## All phases

Subject Item	PM <sub>10</sub>			SO <sub>2</sub>			NOx			CO			VOC		
	Avg lb/hr	Max lb/hr	Tons/Year	Avg lb/hr	Max lb/hr	Tons/Year	Avg lb/hr	Max lb/hr	Tons/Year	Avg lb/hr	Max lb/hr	Tons/Year	Avg lb/hr	Max lb/hr	Tons/Year
ARE 002 CK-XX-2	3.80	41.20	16.50												
EQT 001 2-72	4.80	5.80	21.00												
EQT 003 7-72		60.00			2000.00			99.00			< 0.001			0.22	
EQT 004 8-72		90.00			2000.00			99.00			< 0.001			0.22	
EQT 005 CCT1-02	0.10	0.10	0.50												
EQT 006 CT11-02	0.20	0.40	0.90												
EQT 007 DD1-02													0.001	0.001	0.01
EQT 008 AE1-02	< 0.001	< 0.001	< 0.01	< 0.001	0.01	< 0.01	0.12	0.20	0.01	0.20	0.25	0.01	0.01	0.01	< 0.01
EQT 009 AE2-02	< 0.001	< 0.001	< 0.01	< 0.001	0.01	< 0.01	0.12	0.20	0.01	0.20	0.25	0.01	0.01	0.01	< 0.01
EQT 010 4-72	2.70	4.10	8.40												
EQT 011 6-72	8.00	10.00	12.60												
FUG 001 3-72	5.00	10.00	11.70												
FUG 002 1-05													1.40	1.70	6.10
GRP 002 78CAP-02	59.00		263.00	1450.00		6351.00	90.00		394.00	< 0.001		< 0.01	0.20		0.88

Note: Emission rates in bold are from alternate scenarios and are not included in permitted totals

## Permit Phase Totals:

PM10: 334.59 tons/yr

SO2: 6351.00 tons/yr

NOx: 394.02 tons/yr

CO: 0.02 tons/yr

**EMISSION RATES FOR CRITERIA POLLUTANTS**

AI ID: 32804 - CII Carbon LLC - Gramercy Coke Plant

Activity Number: PER19960004

Permit Number: 2560-00047-V0

Air - Title V Regular Permit Initial

**All phases**

VOC: 6.99 tons/yr

Emission rates Notes:

**EMISSION RATES FOR TAP/HAP & OTHER POLLUTANTS**

AI ID: 32804 - CII Carbon LLC - Gramercy Coke Plant

Activity Number: PER19960004

Permit Number: 2560-00047-V0

Air - Title V Regular Permit Initial

**All phases**

Sulfur Trioxide			
Subject Item	Avg lb/hr	Max lb/hr	Tons/Year
EQT 003 7-72		27.50	
EQT 004 8-72		27.50	
GRP 002 78CAP-02	25.00		110.00

Note: Emission rates in bold are from alternate scenarios and are not included in permitted totals

**Permit Parameter Totals:**

Sulfur Trioxide: 110.00 tons/yr

**Emission Rates Notes:**

## SPECIFIC REQUIREMENTS

AI ID: 32804 - CII Carbon LLC - Gramercy Coke Plant

Activity Number: PER19960004

Permit Number: 2560-00047-V0

Air - Title V Regular Permit Initial

### ARE002 CK-XX-2 Green Coke Storage Pile

- 1 Prevent particulate matter from becoming airborne by taking all reasonable precautions. These precautions shall include, but not be limited to, those specified in LAC 33:III.1305.1-7. [LAC 33:III.1305]
- 2 Permittee shall control particulate matter emissions from the green coke storage pile by using a water spraying (sprinkler) system. [LAC 33:III.501.C.6]

### EQT001 2-72 Cooler Scrubber

- 3 Prevent particulate matter from becoming airborne by taking all reasonable precautions. These precautions shall include, but not be limited to, those specified in LAC 33:III.1305.1-7. [LAC 33:III.1305]
  - 4 Total suspended particulate  $\leq 43.40$  lb/hr. The rate of emission shall be the total of all emission points from the source. [LAC 33:III.1311.B]  
Which Months: All Year Statistical Basis: None specified
  - 5 Cyclone vents: Equipment/operational data monitored by technically sound method once every six months or whenever visual checks indicate maintenance may be necessary. Perform maintenance as necessary. [LAC 33:III.501.C.6]  
Which Months: All Year Statistical Basis: None specified
  - 6 Cyclone vents: Equipment/operational data recordkeeping by electronic or hard copy upon each occurrence of inspection. Keep records of maintenance inspections on site and available for inspection by the Office of Environmental Compliance, Surveillance Division. [LAC 33:III.501.C.6]
  - 7 Flow rate monitored by flow rate monitoring device once every four hours. [LAC 33:III.501.C.6]  
Which Months: All Year Statistical Basis: None specified
  - 8 Flow rate recordkeeping by electronic or hard copy once every four hours. [LAC 33:III.501.C.6]
  - 9 Submit report: Due annually, by the 31st of March for the preceding calendar year. List the hours that the scrubber operated out of the ranges specified. Submit report to the Office of Environmental Compliance, Enforcement Division. [LAC 33:III.501.C.6]
  - 10 Permittee shall maintain the wet scrubber with a 93.7% removal efficiency to control particulate matter. [LAC 33:III.501.C.6]
  - 11 Flow rate  $\geq 30$  gallons/min. [LAC 33:III.501.C.6]  
Which Months: All Year Statistical Basis: None specified
  - 12 The wet scrubber utilizes once through facility process water, therefore, maintaining a constant pH. Process water from a well is sent through the scrubber's spray bars and is then collected in a sump. The water is then used elsewhere in the process or is discharged via the facility's LPDES water discharge permit. [LAC 33:III.501.C.6]
  - 13 Particulate matter (10 microns or less)  $\geq 82.0$  % removal efficiency maintained by cyclone. [LAC 33:III.501.C.6]  
Which Months: All Year Statistical Basis: None specified
  - 14 Cyclone vents: Pressure drop monitored by pressure drop instrument continuously. [LAC 33:III.501.C.6]  
Which Months: All Year Statistical Basis: None specified
  - 15 Cyclone vents: Pressure drop recordkeeping by electronic or hard copy daily. [LAC 33:III.501.C.6]
- ### EQT003 7-72 Waste Heat Boiler
- 16 Opacity  $\leq 20$  percent, except during the cleaning of a fire box or building of a new fire, soot blowing or lancing, charging of an incinerator, equipment changes, ash removal or rapping of precipitators, which may have an opacity in excess of 20 percent for not more than one six-minute period in any 60 consecutive minutes. [LAC 33:III.1101.B]  
Which Months: All Year Statistical Basis: None specified
  - 17 Prevent particulate matter from becoming airborne by taking all reasonable precautions. These precautions shall include, but not be limited to, those specified in LAC 33:III.1305.1-7. [LAC 33:III.1305]
  - 18 Total suspended particulate  $\leq 43.40$  lb/hr. The rate of emission shall be the total of all emission points from the source. [LAC 33:III.1311.B]  
Which Months: All Year Statistical Basis: None specified

## SPECIFIC REQUIREMENTS

AI ID: 32804 - CII Carbon LLC - Gramercy Coke Plant

Activity Number: PER19960004

Permit Number: 2560-00047-V0

Air - Title V Regular Permit Initial

### EQT003 7-72 Waste Heat Boiler

- 19 Sulfur dioxide  $\leq$  2000 ppmv at standard conditions. [LAC 33:III.1503.C] Which Months: All Year Statistical Basis: Three-hour average
- 20 Equipment/operational data recordkeeping by electronic or hard copy continuously. Record and keep on site for at least two years the data required to demonstrate compliance with the provisions of LAC 33:III Chapter 15. Record all emissions data in the units of the standard using the averaging time of the standard. Make records available to a representative of DEQ or the U.S. EPA on request. [LAC 33:III.1513]
- 21 Cyclone vents: Visible emissions monitored by visual inspection/determination daily. [LAC 33:III.501.C.6] Which Months: All Year Statistical Basis: None specified
- 22 Cyclone vents: Visible emissions recordkeeping by electronic or hard copy daily. [LAC 33:III.501.C.6]
- 23 Cyclone vents: Equipment/operational data monitored by technically sound method once every six months or whenever visual checks indicate maintenance may be necessary. Perform maintenance as necessary. [LAC 33:III.501.C.6] Which Months: All Year Statistical Basis: None specified
- 24 Cyclone vents: Equipment/operational data recordkeeping by electronic or hard copy upon each occurrence of inspection. Keep records of maintenance inspections on site and available for inspection by the Office of Environmental Compliance, Surveillance Division. [LAC 33:III.501.C.6]
- 25 Flue gas: SO<sub>2</sub>  $<$  750 ppmv; SO<sub>3</sub>  $<$  20 ppmv; NO<sub>x</sub> (as NO<sub>2</sub>)  $<$  120 ppmv. [LAC 33:III.501.C.6]
- 26 Particulate matter (10 microns or less)  $\geq$  99.0 % removal efficiency. [LAC 33:III.501.C.6] Which Months: All Year Statistical Basis: None specified
- 27 In accordance with LAC 33:III.1511.C, in place of continuous monitoring, permittee shall keep a daily record of quantity of green petroleum coke fed and its sulfur content. The SO<sub>2</sub> emissions from the Waste Heat Boiler Stack (Emission Point 7-72) shall be calculated monthly. Cumulative SO<sub>2</sub> released during the preceding 12 consecutive months shall be totaled monthly. Exceedance of the SO<sub>2</sub> permit limit in any consecutive 12 month period shall be reported to the Office of Environmental Compliance, Enforcement Division within 30 days. Records showing the monthly and cumulative twelve month SO<sub>2</sub> released shall be kept on site and available for inspection by DEQ personnel. [LAC 33:III.501.C.6]

### EQT004 8-72 Pyroscrubber

- 28 Opacity  $\leq$  20 percent, except during the cleaning of a fire box or building of a new fire, soot blowing or lancing, charging of an incinerator, equipment changes, ash removal or rapping of precipitators, which may have an opacity in excess of 20 percent for not more than one six-minute period in any 60 consecutive minutes. [LAC 33:III.1101.B] Which Months: All Year Statistical Basis: None specified
- 29 Prevent particulate matter from becoming airborne by taking all reasonable precautions. These precautions shall include, but not be limited to, those specified in LAC 33:III.1305.1-7. [LAC 33:III.1305]
- 30 Total suspended particulate  $\leq$  42.06 lb/hr. The rate of emission shall be the total of all emission points from the source. [LAC 33:III.1311.B] Which Months: All Year Statistical Basis: None specified
- 31 Sulfur dioxide  $\leq$  2000 ppmv at standard conditions. [LAC 33:III.1503.C] Which Months: All Year Statistical Basis: Three-hour average
- 32 The pyroscrubber shall operate at 2200-2550 degrees F with 4-12% excess air to assure destruction of residual particulates and VOC. [LAC 33:III.501.C.6]
- 33 Operating time  $\leq$  500 hr/yr in which the pyroscrubber shall vent through the pyroscrubber stack. Noncompliance with this limitation is a reportable violation of the permit. Notify the Office of Environmental Compliance, Enforcement Division if venting through the pyroscrubber stack exceeds the maximum hours listed in this specific condition for any twelve consecutive month period. [LAC 33:III.501.C.6] Which Months: All Year Statistical Basis: None specified

## SPECIFIC REQUIREMENTS

AI ID: 32804 - CII Carbon LLC - Gramercy Coke Plant

Activity Number: PER19960004

Permit Number: 2560-00047-V0

Air - Title V Regular Permit Initial

### EQT004      **8-72 Pyroscrubber**

- 34 Equipment/operational data recordkeeping by electronic or hard copy monthly. Keep records of the total hours the pyroscrubber vented through the pyroscrubber stack each month, as well as the total hours for the last twelve months. Make records available for inspection by DEQ personnel. [LAC 33:III.501.C.6]
- 35 Submit report: Due annually, by the 31st of March. Report the hours the pyroscrubber vented through the pyroscrubber stack for the preceding calendar year to the Office of Environmental Compliance, Enforcement Division. [LAC 33:III.501.C.6]
- 36 Operating time monitored by technically sound method continuously for operation of pyroscrubber venting through the pyroscrubber stack. [LAC 33:III.501.C.6]  
Which Months: All Year    Statistical Basis: None specified
- 37 In accordance with LAC 33:III.1511.C, in place of continuous monitoring, permittee shall keep a daily record of quantity of green petroleum coke fed and its sulfur content. The SO<sub>2</sub> emissions from the Waste Heat Boiler Stack (Emission Point 7-72) shall be calculated monthly. Cumulative SO<sub>2</sub> released during the preceding 12 consecutive months shall be totaled monthly. Exceedance of the SO<sub>2</sub> permit limit in any consecutive 12 month period shall be reported to the Office of Environmental Compliance, Enforcement Division within 30 days. Records showing the monthly and cumulative twelve month SO<sub>2</sub> released shall be kept on site and available for inspection by DEQ personnel. [LAC 33:III.501.C.6]

### EQT005      **CCT1-02 Calcined Coke Storage Tank**

- 38 Prevent particulate matter from becoming airborne by taking all reasonable precautions. These precautions shall include, but not be limited to, those specified in LAC 33:III.1305.1-7. [LAC 33:III.1305]
- 39 Total suspended particulate ≤ 40.35 lb/hr. The rate of emission shall be the total of all emission points from the source. [LAC 33:III.1311.B]  
Which Months: All Year    Statistical Basis: None specified
- 40 Permittee shall control particulate matter emissions with a 75% efficiency by treating calcined coke with dedust oil. [LAC 33:III.501.C.6]

### EQT008      **AE1-02 Auxiliary Engine No. 1**

- 41 Opacity ≤ 20 percent; except emissions may have an average opacity in excess of 20 percent for not more than one six-minute period in any 60 consecutive minutes (Complies by using sweet natural gas as fuel). [LAC 33:III.1311.C]  
Which Months: All Year    Statistical Basis: Six-minute average

### EQT009      **AE2-02 Auxiliary Engine No. 2**

- 42 Opacity ≤ 20 percent; except emissions may have an average opacity in excess of 20 percent for not more than one six-minute period in any 60 consecutive minutes (Complies by using sweet natural gas as fuel). [LAC 33:III.1311.C]  
Which Months: All Year    Statistical Basis: Six-minute average

### EQT010      **4-72 Calcined Coke Storage Domes**

- 43 Prevent particulate matter from becoming airborne by taking all reasonable precautions. These precautions shall include, but not be limited to, those specified in LAC 33:III.1305.1-7. [LAC 33:III.1305]
- 44 Total suspended particulate ≤ 55.44 lb/hr. The rate of emission shall be the total of all emission points from the source. [LAC 33:III.1311.B]  
Which Months: All Year    Statistical Basis: None specified
- 45 Permittee shall control particulate matter emissions with a 99% control efficiency by treating calcined coke with a chemical agent prior to storage. The collected particulate matter is routed for combustion into the pyroscrubber. [LAC 33:III.501.C.6]

### EQT011      **6-72 Dock Load-Out Spout**

## **SPECIFIC REQUIREMENTS**

**AI ID: 32804 - CII Carbon LLC - Gramercy Coke Plant**

**Activity Number: PER19960004**

**Permit Number: 2560-00047-V0**

**Air - Title V Regular Permit Initial**

### **EQT011      6-72 Dock Load-Out Spout**

- 46 Prevent particulate matter from becoming airborne by taking all reasonable precautions. These precautions shall include, but not be limited to, those specified in LAC 33:III.1305.1-7. [LAC 33:III.1305]
- 47 Total suspended particulate  $\leq$  64.76 lb/hr. The rate of emission shall be the total of all emission points from the source. [LAC 33:III.1311.B]  
Which Months: All Year Statistical Basis: None specified
- 48 Permittee shall control particulate matter emissions with a 90% efficiency by treating calcined coke with a chemical wetting agent and dedust oil, and by loading it onto vessels through a telescoping spout. [LAC 33:III.501.C.6]

### **FUG001      3-72 Calcined Load-In**

- 49 Prevent particulate matter from becoming airborne by taking all reasonable precautions. These precautions shall include, but not be limited to, those specified in LAC 33:III.1305.1-7. [LAC 33:III.1305]
- 50 Total suspended particulate  $\leq$  48.43 lb/hr. The rate of emission shall be the total of all emission points from the source. [LAC 33:III.1311.B]  
Which Months: All Year Statistical Basis: None specified
- 51 Permittee shall control particulate matter emissions with a 75% efficiency by treating calcined coke with a chemical wetting agent and dedust oil. [LAC 33:III.501.C.6]

### **GRP001**

- 52 Emissions of smoke which pass onto or across a public road and create a traffic hazard by impairment of visibility as defined in LAC 33:III.111 or intensify an existing traffic hazard condition are prohibited. [LAC 33:III.1109.B]
- 53 Outdoor burning of waste material or other combustible material is prohibited. [LAC 33:III.1109.B]
- 54 Emissions of particulate matter which pass onto or across a public road and create a traffic hazard by impairment of visibility or intensify an existing traffic hazard condition are prohibited. [LAC 33:III.1303.B]
- 55 Maintain best practical housekeeping and maintenance practices at the highest possible standards to reduce the quantity of organic compounds emissions. Good housekeeping shall include, but not be limited to, the practices listed in LAC 33:III.2113.A.1-5. [LAC 33:III.2113.A]
- 56 Failure to pay the prescribed application fee or annual fee as provided herein, within 90 days after the due date, will constitute a violation of these regulations and shall subject the person to applicable enforcement actions under the Louisiana Environmental Quality Act including, but not limited to, revocation or suspension of the applicable permit, license, registration, or variance. [LAC 33:III.219]
- 57 Carbon monoxide  $\leq$  0.02 tons/yr. [LAC 33:III.501.C.6]  
Which Months: All Year Statistical Basis: Annual maximum
- 58 Nitrogen oxides  $\leq$  394.02 tons/yr. [LAC 33:III.501.C.6]  
Which Months: All Year Statistical Basis: Annual maximum
- 59 Particulate matter (10 microns or less)  $\leq$  334.59 tons/yr. [LAC 33:III.501.C.6]  
Which Months: All Year Statistical Basis: Annual maximum
- 60 Sulfur dioxide  $\leq$  6351.00 tons/yr. [LAC 33:III.501.C.6]  
Which Months: All Year Statistical Basis: Annual maximum
- 61 Sulfur Trioxide  $\leq$  110.00 tons/yr. [LAC 33:III.501.C.6]  
Which Months: All Year Statistical Basis: Annual maximum
- 62 VOC, Total  $\leq$  6.99 tons/yr. [LAC 33:III.501.C.6]  
Which Months: All Year Statistical Basis: Annual maximum

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**Activity Number: PER19960004**

**Permit Number: 2560-00047-V0**

**Air - Title V Regular Permit Initial**

**GRP001**

- 63 Submit standby plan for the reduction or elimination of emissions during an Air Pollution Alert, Air Pollution Warning, or Air Pollution Emergency: Due within 30 days after requested by the administrative authority. [LAC 33:III.5611.A]
- 64 During an Air Pollution Alert, Air Pollution Warning or Air Pollution Emergency, make the standby plan available on the premises to any person authorized by the department to enforce these regulations. [LAC 33:III.5611.B]
- 65 Submit Emission Inventory (EI)/Annual Emissions Statement: Due annually, by the 31st of March for the period January 1 to December 31 of the previous year unless otherwise directed. Submit emission inventory data in the format specified by the Office of Environmental Assessment, Environmental Evaluation Division. Include all data applicable to the emissions source(s), as specified in LAC 33:III.919.A-D. [LAC 33:III.919.D]
- 66 Submit Title V permit application for renewal: Due 180 calendar days before permit expiration date. [40 CFR 70.5(a)(1)(iii)]
- 67 Submit Title V monitoring results report: Due semiannually, by March 31st and September 30th for the preceding periods encompassing July through December and January through June, respectively. Submit reports to the Office of Environmental Compliance, Surveillance Division. Certify reports by a responsible company official. Clearly identify all instances of deviations from permitted monitoring requirements. For previously reported deviations, in lieu of attaching the individual deviation reports, clearly reference the communication(s)/correspondence(s) constituting the prior report, including the date the prior report was submitted. [40 CFR 70.6(a)(3)(iii)(A)]
- 68 Submit Title V excess emissions report: Due quarterly, by June 30, September 30, December 31, March 31. Submit reports of all permit deviations to the Office of Environmental Compliance, Surveillance Division. Certify all reports by a responsible official in accordance with 40 CFR 70.5(d). The reports submitted on March 31 and September 30 may be consolidated with the semi-annual reports required by 40 CFR 70.6(a)(3)(iii)(A) as long as the report clearly indicates this and all required information is included and clearly delineated in the consolidated report. [40 CFR 70.6(a)(3)(iii)(B)]
- 69 Submit Title V compliance certification: Due annually, by the 31st of March. Submit to the Office of Environmental Compliance, Surveillance Division. [40 CFR 70.6(c)(5)(iv)]
- 70 Comply with the standards for recycling and emissions reduction pursuant to 40 CFR Part 82, Subpart F, except as provided for Motor Vehicle Air Conditioners (MVACs) in Subpart B. [40 CFR 82.Subpart F]